

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**PLAINTIFFS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES BY
DEFENDANT BAIN CAPITAL PRIVATE EQUITY**

Plaintiffs Jessica Jones and Christina Lorenzen (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, move this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule 26.1(b), for an order compelling Defendant Bain Capital Private Equity to respond fully to Plaintiff’s First Set of Interrogatories. Defendant Bain Capital Private Equity has objected and refused to comply with the following discovery requests, the responses to which are set forth verbatim, in accordance with Local Rule 26.1(b)(2):

Interrogatory No. 1:

State each affirmative defense to the claims against You.

Objection and Response to Interrogatory No. 1:

Bain objects to Interrogatory 1 as seeking information that Bain is not required to provide prior to filing an answer in this case. Bain will identify its affirmative defenses when an answer is required under the Federal Rules of Civil Procedure.

Interrogatory No. 2:

State each fact which supports each affirmative defense stated in response to Interrogatory No. 1.

Objection and Response to Interrogatory No. 2:

Bain objects to Interrogatory 2 as seeking information that Bain is not required to provide prior to filing an answer in this case, and as seeking attorney work product. Bain will identify the facts supporting its affirmative defenses if, when, and to the extent it is required to do so under the Federal Rules of Civil Procedure.

Dated: April 13, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri
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CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri
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